

APPENDIX B

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

MARIA ALEJANDRA CELIMEN SAVINO,
et al.,

Plaintiffs-Petitioners,

v.

STEVEN SOUZA,

Defendant-Respondent.

Case No. 1:20-cv-10617-WGY

May 4, 2020

**PETITIONERS' RESPONSES AND OBJECTIONS TO RESPONDENT'S FIRST
REQUEST FOR DOCUMENTS**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Petitioners hereby submit the following responses and objections to the Requests for Documents served by Respondent. These responses are made within the limits of, and subject to, the objections set forth below. In setting forth their responses to the Requests for Documents, Petitioners do not waive the attorney-client privilege, work-product doctrine, or any other privilege or immunity from disclosure that may attach to information called for in response to the Requests for Documents.

Further, the following responses (and any further responses to the Requests for Documents) are made without acknowledgment of the admissibility or relevance of the information requested or that the Requests are proportional to the needs of this case.

Respondent's Request No. 1:

Please produce all documents identified in your answers to Defendants' interrogatories.

Petitioners' Response: These documents will be produced (Bates-stamped P_00000001 to P_00001630).

Respondent's Request No. 2:

To the extent not provided in response to Request No. 1, please provide all documents authored by any Class member, including, but not limited to, any document sent to, or received from the media and any document sent or delivered by one Class member to another.

Petitioners' Response: Petitioners object to this Request because it is overbroad and not proportional to the needs of the case, in that it requests “all documents authored by any Class member,” without any limitation as to time or subject matter.

Respondent's Request No. 3:

Provide all documents relating to any criminal charges or convictions pertaining to any Class member if not previously provided to the Court and undersigned counsel.

Petitioners' Response: Petitioners are not in possession of any information or documents responsive to Request No. 3.